

HEATHER E. WILLIAMS, Bar #122664
Federal Defender
ERIN SNIDER, Bar #304781
Assistant Federal Defender
Office of the Federal Defender
2300 Tulare Street, Suite 330
Fresno, California 93721
Tel: (559) 487-5561
Fax: (559) 487-5950

Attorneys for Defendant
BRIGIT MARIE BISSELL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRIGIT MARIE BISSELL,

Defendant.

Case No. 1:22-cr-00031-DAD-BAM-1

STIPULATION TO REMOVE
CONDITION OF PRETRIAL RELEASE;
ORDER THEREON

JUDGE: Hon. Erica P. Grosjean

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, Assistant United States Attorney Antonio Jose Pataca, counsel for plaintiff, and Assistant Federal Defender Erin Snider, counsel for defendant Brigit Marie Bissell, that the Court may remove the location-monitoring condition of Ms. Bissell's pretrial release (Condition 7(b)). Pretrial Services supports this request.

On January 20, 2022, Ms. Bissell appeared before the Honorable Stanley A. Boone for a detention hearing. ECF #11. The Court ordered Ms. Bissell's release subject to conditions. *Id.*; *see also* ECF #15. On January 28, 2022, the government filed a motion for bail review. ECF #20. On February 17, 2022, after much litigation, the Honorable Dale A. Drozd ordered Ms. Bissell to remain on release but added Condition 7(b), a home-detention condition. ECF #42; ECF #43. On June 3, 2022, the Honorable Barbara A. McAuliffe signed an order modifying the location-monitoring condition to curfew rather than home detention. ECF #53.

1 On September 27, 2022, the parties filed a plea agreement, pursuant to which Ms. Bissell
2 will plead to a violation of 18 U.S.C. §§ 371 and 2232, conspiracy to destroy or remove property
3 to prevent seizure. ECF #77. The offense carries a five-year maximum term of imprisonment. *Id.*
4 The government will dismiss the remaining charges in the indictment and recommend a time-
5 served sentence with two years of supervised release. *Id.* A change-of-plea hearing is scheduled
6 for October 11, 2022, at 8:30 a.m.

7 In light of Ms. Bissell's compliance and the parties' plea agreement that dramatically
8 changes Ms. Bissell's exposure, the parties jointly request that the Court remove Ms. Bissell's
9 location-monitoring condition. Ms. Bissell's Pretrial Services Officer in the Western District of
10 Washington and Anthony Perez, the Pretrial Services Officer in this District, are supportive of
11 this request.

12 Accordingly, the parties hereby stipulate that the Court may remove Condition 7(b) of
13 Ms. Bissell's conditions of pretrial release.

14
15 Respectfully submitted,

16 PHILLIP A. TALBERT
17 United States Attorney

18 Date: September 30, 2022

/s/ Antonio Jose Pataca
19 ANTONIO JOSE PATACA
Assistant United States Attorney
20 Attorney for Plaintiff

21 HEATHER E. WILLIAMS
22 Federal Defender

23 Date: September 30, 2022

/s/ Erin Snider
24 ERIN SNIDER
Assistant Federal Defender
25 Attorney for Defendant
BRIGIT MARIE BISSELL
26
27
28

ORDER

Upon the parties' stipulation and for good cause shown, the Court hereby removes Condition 7(b) of defendant Brigit Marie Bissell's pretrial release.

IT IS SO ORDERED.

Dated: **September 30, 2022**

/s/ Eric P. Groj
UNITED STATES MAGISTRATE JUDGE